

REMARKS

Reconsideration and the timely allowance of the pending claims, in view of the following remarks, are respectfully requested.

In the Office Action dated April 27, 2005, the Examiner rejected claims 1-4, under 35 U.S.C. §102(b), as allegedly being anticipated by Harada '774 (U.S. Patent No. 6,251,774).

By this Amendment, Applicant has cancelled claim 2 and has amended claims 1 and 3-4 to provide a clearer presentation of the claimed subject matter. Applicant submits that no new matter has been introduced.

Applicant respectfully traverses the prior art rejections, under 35 U.S.C. §102(b), for the following reasons:

As indicated above, amended claim 1 now positively recites filling the insides of the via holes to a prescribed thickness using non-conductive material by forming a non-conductive material layer on the insulating layer in which the via holes are formed and selectively removing the non-conductive material layer to expose the insulating layer and allow the non-conductive material to remain for a prescribed thickness. Such features are amply supported by the embodiments described in the Specification. (*See e.g., Specification*, page 4, lines 13-20; FIG. 5).

Unlike the present invention, there is nothing in the references of record, including the Harada '774 reference, that teaches the combination of features recited in claim 1. In particular, the Harada '774 reference discloses that after opening a via hole 46, the first photoresist film 42 is removed and the via hole 46 is filled with a photoresist film 48, which is then irradiated and heated, and a second anti-reflective coating 50 is applied over the hardened photoresist film 48. (*See Harada '774*: col. 6, lines 19-29; col. 9, lines 4-8; FIGs. 1C, 4C).

With this said, however, there is nothing in the Harada '774 reference that teaches or remotely suggests filling the insides of the via holes to a prescribed thickness using non-conductive material by forming a non-conductive material layer on the insulating layer in which the via holes are formed and selectively removing the non-conductive material layer to expose the insulating layer and allow the non-conductive material to remain for a prescribed thickness, as required by claim 1.

For at least these reasons, Applicant submits that the Harada '774 reference does not teach the claimed combination of elements recited by amended claim 1. Accordingly, the Harada '774 reference cannot be deemed to anticipate claim 1, or dependent claims 3-4, and Applicant requests the immediate withdrawal of the rejection of claims 1 and 3-4 under 35 U.S.C. §102(b).

Moreover, as best understood, none of the references of record, whether taken alone or in combination with Harada '774, are capable of curing the deficiencies noted above regarding the Harada '774 reference. Therefore, claims 1 and 3-4 cannot be rendered unpatentable by the references of record.

All matters having been addressed and in view of the foregoing, Applicant respectfully requests the entry of this Amendment, the Examiner's reconsideration of this application, and the immediate allowance of all pending claims.

Applicant's Counsel remains ready to assist the Examiner in any way to facilitate and expedite the prosecution of this matter. Please charge any fees associated with the submission of this paper to Deposit Account Number 033975, Order No. 040021-0305237.

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The Commissioner for Patents is also authorized to credit any over payments to the above-referenced Deposit Account.

Respectfully submitted,

**PILLSBURY WINTHROP
SHAW PITTMAN LLP**



E. RICO HERNANDEZ
Reg. No. 47641
Tel. No. (703) 905-2088
Fax No. (703) 905-2500

ERH/smm
P.O. Box 10500
McLean, VA 22102
(703) 905-2000